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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

17 HYPERMEDIA NAVIGATION LLC,

18 Plaintiff,

19 v.

20 GOOGLE LLC,

21 Defendant.

Case No. 4:18-cv-06137-HSG

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF TO FILE ANY FURTHER
AMENDED COMPLAINT**

23 Under the Court's Order Granting Defendant Google LLC's ("Google") Motion to Dismiss
24 Claims for Induced and Willful Infringement (ECF No. 47), Plaintiff Hypermedia Navigation LLC
25 ("Hypermedia") must file any further amended complaint on or before **April 30, 2019**.

26 Pursuant to Civil L.R. 6-2 and 7-12, the parties have agreed to jointly request a three-week
27 extension of the deadline for Hypermedia's Second Amended Complaint to **May 20, 2019**.

28 STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINE
NO. 4:18-CV-06137-HSG

1 On April 12, 2019, Hypermedia served discovery requests seeking information regarding
2 Google's pre-suit communications with non-party Yahoo!. Google's responses to these requests
3 are not due until May 13, 2019, two weeks after the current April 30, 2019 deadline for
4 Hypermedia's Second Amended Complaint. The parties make this request for extension to allow
5 Hypermedia an opportunity to review Google's discovery responses before filing its Second
6 Amended Complaint, which the parties agree would promote efficiency.

7 There have been no previous requests for extensions with respect to the deadline for
8 Hypermedia's Second Amended Complaint and the requested three-week extension of this deadline
9 would not alter the schedule for the rest of the case or any additional deadlines in the case schedule.

10 The parties therefore respectfully request that the Court modify the schedule to change the
11 deadline for Hypermedia to file a Second Amended Complaint to **May 20, 2019**.

12
13
14 Dated: April 19, 2019

Respectfully submitted,
NI, WANG & MASSAND, PLLC

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16
17 By: /s/ Hao Ni
Hao Ni

18 Attorney for Plaintiff
19 HYPERMEDIA NAVIGATION LLC

20 Dated: April 19, 2019

O'MELVENY & MYERS LLP

21
22 /s/ Mark Liang
23 Mark Liang

24 Attorneys for Defendant
25 GOOGLE LLC

1 **FILER'S ATTESTATION**

2 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Mark Liang, attest that
3 concurrence in the filing of this document has been obtained.

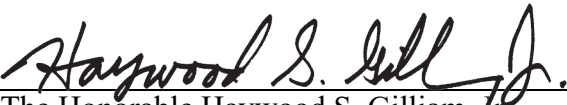
4 Dated: April 19, 2019

/s/ Mark Liang
Mark Liang

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 4/22/2019


The Honorable Haywood S. Gilliam, Jr.
United States District Judge

STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINE
NO. 4:18-CV-06137-HSG